

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
JOY CHEN
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Joy_Chen@fd.org
Atorney for Pedro Nunez Manrique

Attorney for Pedro Nunez Manrique

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
PEDRO NUNEZ MANRIQUE,
Defendant.

Case No. 2:24-mj-00578-EJY

**STIPULATION TO CONTINUE
BENCH TRIAL
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and Between Jason M. Frierson, United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Pedro Nunez Manrique, that the bench trial currently scheduled on January 15, 2025, be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. The parties require additional time for negotiations of a possible plea agreement in this matter.

2. Defense counsel requires additional time to review discovery, conduct independent investigation, and counsel the defendant on his options.

1 3. The defendant is out of custody and does not oppose the continuance.
2 4. The parties agree to the continuance
3 5. Additionally, denial of this request for continuance could result in a
4 miscarriage of justice. The additional time requested by this Stipulation is excludable in
5 computing the time within which the trial herein must commence pursuant to the Speedy Trial
6 Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title
7 18, United States Code § 3161(h)(7)(B)(iv).

8 This is the first request for a continuance of the bench trial.

9 DATED this 7th day of January, 2025.

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11 RENE L. VALLADARES
12 Federal Public Defender

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14 JASON M. FRIERSON
15 United States Attorney

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17 By /s/ Joy Chen
18 JOY CHEN
19 Assistant Federal Public Defender

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21 By /s/ Skyler Pearson
22 SKYLER PEARSON
23 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
PEDRO NUNEZ MANRIQUE,
Defendant.

Case No. 2:24-mj-00578-EJY

ORDER

IT IS THEREFORE ORDERED that the bench trial currently scheduled on Wednesday, January 15, 2025, at 9:30 a.m., be vacated and continued to March 26, 2025 at the hour of 9:30 a.m. in Courtroom 3D.

DATED this 7th day of January, 2025.

Leyna J. Zouchah
UNITED STATES MAGISTRATE JUDGE